Doc Code: AP.PRE.REQ

PRE-APPEAL BRIEF REQUEST FOR REVIEW

PRE-APPEAL BRIEF REQUEST FOR REVIEW	Docket Number (Optional) **T2147-907643**

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to "Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" [37 CFR 1.8(a)] on _____ Signature _____ Typed or printed name_____	Application Number **10/031,992**	Filed **January 25, 2002**
	First Named Inventor **FREREBEAU, LAURENT**	
	Art Unit **2176**	Examiner **N. HILLERY**

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
        Note: No more than five (5) pages may be provided.

I am the

☐ applicant/inventor.

☐ assignee of record of the entire interest.
        See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed.
        (Form PTO/SB/96)

☐ attorney or agent of record.
        Registration number _____.

☒ attorney or agent acting under 37 CFR 1.34.
        Registration number if acting under 37 CFR 1.34. . <u>45,285</u>

Signature

<u>Jason H. Vick</u>
Typed or printed name

<u>703/610-8651</u>
Telephone number

<u>July 11, 2006</u>
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required.
Submit multiple forms if more than one signature is required, see below*.

☐ *Total of_____forms are submitted.

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of:

First Named Inventor: FREREBEAU, LAURENT   Art Unit: 2176

Application No.: 10/031,992   Examiner: N. Hillery

Filed: January 25, 2002   Confirmation No.: 8715

For: SYSTEM AND METHOD FOR
INTERNATIONALIZING THE CONTENT OF
MARKUP DOCUMENTS IN A COMPUTER
SYSTEM

* * *

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Mail Stop AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

In response to the Final Office Action of March 30, 2006, and in conjunction with

the attached Notice of Appeal, Appellants hereby request review of the Final Office

Action in the above application.

Appellants respectfully submit the pending claims are patentably distinguishable

from the cited references at least based on the following comments.

Independent claim 14 recites a method for internationalizing a mark-up document

including detecting a localization tag in the document, the localization tag controlling one

or more of structure, appearance and dynamic behavior of the mark-up document,

retrieving, from the document, localization information associated with the localization

tag, the localization information associated with one or more of a language and a culture,

searching a translation file for a previously determined localization value associated with the localization information, and replacing the localization tag in the document with the localized value found in the translation file.

Dallett, which is relied upon as the primary reference, is generally directed toward changing an orientation of displayed characters on a screen based on a "DIR tag". At least based on page 2 of Dallett, where the "DIR" attribute is discussed, it is abundantly clear that the DIR attribute is utilized at run-time to cause the entire page to display from either left to right or right to left. As stated in Dallett, "this means that the page is rendered so that the top-right corner is the origin, with the x-axis increasing from right to left. The properly constructed page will flow correctly with the DIR attribute set to either RTL or LTR (leaving this attribute off of the element will default to LTR). The lions share of the page reversal is provided to you for free. ...the reading order of the document can be changed at run-time by setting the DIR property of the document object through script."

However, there is absolutely no teaching or suggestion in Dallett of localization information being associated with the one or more of a culture and a language nor of the localization value being previously determined.

In contradistinction, Dallett is simply changing the orientation of displayed characters on the screen and there is no teaching, suggestion, nor mechanisms provided to allow the replacing of localization tags with previously determined localization values as recited in the claim. The Office asserts that "Dallett explicitly teaches that because the actual Windows update site uses an automated preprocessing step to determine the value of conditional variables, you won't be able to see this code if you view the page's source. This is client-side scripted equivalent of the actual code used (P6, first paragraph).

Further, the Office has interpreted the preprocessing step of Dallett to be synonymous

with the phrase previously determined as claimed within the broadest, reasonable

interpretation of the phrase in light of the specification."

Appellants respectfully submit that Dallett is simply changing the orientation of

displayed characters on the screen. The Office's assertion regarding the preprocessing

step of Dallett is simply incorrect. Specifically, the preprocessing step of Dallett referred

to on page 6 relates to the Windows update site. The preprocessing is used to configure

and determine the value of conditional variables. For example, when looking at the

Windows update site, this preprocessing can include determining, for example, which

version of Windows you are running, which version of Office you are running, and the

like. These conditional variables are populated based on the detected information.

However, this has absolutely nothing to do with localization information as asserted by

the Office.

The function of the DIR attribute in its operation becomes abundantly clear in

Dallett upon review of page 2. In particular, Dallett explicitly states on page 2 that "the

reading order of the document can be changed *at run time* by setting the DIR property of

the document object through script." (italics added) Appellants respectfully submit that

the localization performed by Dallett is performed at run time, and is not determined,

based on, or utilizing previously determined localized values as claimed.

Comparable arguments can be made for independent claims 24, 27 and 28.

Regarding independent claim 23, a localization tag is adapted to be detected by a

localization tool and in which localization information associated with the tag is retrieved

including retrieving localization information associated with the tag and replacing the

localization tag with a localized value associated with the localization information.

In contradistinction, Dallett is simply changing the direction of displayed text, and is not replacing the localization tag as claimed.
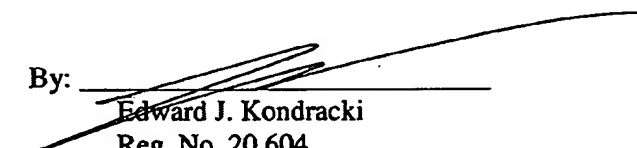
In that the secondary reference to Jeske fails to overcome the deficiencies of Dallett, Appellants respectfully submit the outstanding rejections are untenable and should be withdrawn. The Board is respectfully requested to overturn the outstanding rejections and allow the application to pass to issue.

The Commissioner is hereby authorized to charge to Deposit Account No. 50-1165 (T2147-907643) any fees under 37 C.F.R. §§ 1.16 and 1.17 that may be required by this paper and to credit any overpayment to that Account. If any extension of time is required in connection with the filing of this paper and has not been separately requested, such extension is hereby requested.

Respectfully submitted,

Date: July 11, 2006   By: _____
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